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Filing date: **06/01/2016**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91227978
Party	Defendant The Insurance Source
Correspondence Address	BEN KLOSOWSKI THRIVE-IP 5401 NETHERBY LANE, SUITE 1201 NORTH CHARLESTON, SC 29420 UNITED STATES ben.klosowski@thrive-ip.com
Submission	Request to Withdraw as Attorney
Filer's Name	Ben Klosowski
Filer's e-mail	mary.bryant@thrive-ip.com, ben@thrive-ip.com
Signature	/Ben Klosowski/
Date	06/01/2016
Attachments	06_01_2016_Request_to_Withdraw_as_Attorney_1154_2OP1.pdf(90507 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Combined Insurance Company of America)	
Opposer,)	Mark: WE MAKE HEALTH
)	INSURANCE EASIER.
v.)	
)	Application No. 86/734,955
The Insurance Source)	
Applicant,)	Opposition No. 91227978
)	

REQUEST TO WITHDRAW AS ATTORNEY

This revised ‘Request to Withdraw as Attorney’ is responsive to the May 31, 2016 notice denying this firm’s request to withdraw as counsel for Applicant in this proceeding and setting forth June 30, 2016 as the deadline to submit a motion in compliance with Trademark Rules 2.19(b) and Patent and Trademark Rule 11.116. As noted in the Request to Withdraw filed on May 27, 2016, the Applicant expressly declined to retain the undersigned and his firm to represent the Applicant in Opposition No. 91227978; thus, the undersigned and Thrive-IP® have never been Applicant’s attorneys in this Opposition. Nevertheless, a Board representative on May 27, 2016, advised this firm to file the “Request to Withdraw” as the appropriate course of action. Thus, the undersigned and his firm Thrive-IP® again respectfully request to be withdrawn as Applicant’s attorney in Opposition No. 91227978 with the following clarifications.

Responsive to the Board’s denial on May 31, 2016, and in accordance with Rule 2.19(b), (1) please accept the above as the basis for this request.

(2) Regarding Rule 2.19(b) and in accordance with 37 C.F.R. §11.116(a) this ‘Request to Withdraw as Attorney’ is being filed pursuant to written confirmation

received May 13, 2016, from Mr. Guy V. Furay on behalf of his company, *The Insurance Source*, declining the legal services of the undersigned and his firm Thrive-IP® in Opposition No. 91227978. In correspondence dated May 19, 2016, the undersigned confirmed Applicant's May 13 instructions and notified the Applicant of this firm's intention to withdraw from employment in any potential adverse action. This firm further advised the Applicant to retain other counsel or to notify the undersigned by May 26, 2016, if the Applicant changed its mind and wished to retain the undersigned. After Opposition No. 91227978 was instituted, the undersigned again advised the Applicant of this firm's intention to file this "Request to Withdraw" (in accordance with the Board's suggestion) with well over 30 days remaining for the Applicant to retain other counsel and/or answer or otherwise respond to the Opposition.

(3) Regarding the Rule 2.19(b), there are no documents or property that relate to the proceeding in the possession of the undersigned or the firm of Thrive-IP®. Again, the Applicant declined the legal services of the undersigned on May 13, 2016, and the Notice of Opposition was forwarded to the Applicant as a courtesy for Applicant's records on May 19, 2016.

(4) In regards to Rule 2.19(b) requesting the return of any part of a fee paid in advance, *the Applicant has not retained the services of this firm in this Opposition so no advance fee was paid to this firm by the Applicant.* As such, there is no unearned fee and no refund owed to the Applicant.

The new contact information for the Applicant, The Insurance Source and Mr. Guy V. Furay, is as follows:

Address: 114 Trade Street, Greer, SC 29651

E-Mail: guy@insure-u.com

(5) Also pursuant to Rule 2.19(b), please find below the Certificate of Service providing proof of service of this request upon the Applicant and all parties.

Respectfully Submitted,



Date: June 1, 2016

Ben Klosowski, Esq.
Reg. No. 47,710

Thrive-IP®
5401 Netherby Lane, Suite 1201
North Charleston, SC 29420
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BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Combined Insurance Company of America)	
Plaintiff,)	Mark: WE MAKE HEALTH
)	INSURANCE EASIER.
v.)	
)	Application No. 86/734,955
The Insurance Source)	
Defendant,)	Opposition No. 91227978
)	

CERTIFICATE OF SERVICE

I, Mary Bryant, hereby certify that a true and complete copy of the foregoing *Request to Withdraw as Attorney* has been served on the Applicant and Opposer's attorney of record by mailing said copies on June 1, 2016, via First Class Mail, postage prepaid to:

Combined Insurance Company of America 1000 Milwaukee Avenue Glenview, IL 60025 UNITED STATES	Timothy D. Pecsénye Blank Rome LLP One Logan Square Philadelphia, PA 19103 UNITED STATES	Mr. Guy V. Furay The Insurance Source 114 Trade Street Greer, SC 29651 UNITED STATES
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s/ Mary Bryant
Mary Bryant